

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	Cause No. 4:14CR00361CDP/NAB
vs.)	
)	
SHOICHI OKADA,)	
)	
Defendant.)	

**DEFENDANT'S REQUEST FOR EXTENSION OF TIME
TO FILE PRE-TRIAL MOTIONS**

Comes now, Counsel for Defendant, and respectfully requests a two week extension of the filing deadline for pre-trial motions. In support of this motion, Counsel states as follows:

1. Defendant has been charged by indictment with one count of Possession of Child Pornography.
2. The Government's investigation of this case involved forensic evaluation of various computers and hard drives. The case has a number of complex computer issues.
3. Counsel has an appointment to discuss settlement resolutions of this case with the supervisory staff of the United States Attorney's office on July 1, 2015 and requests a few weeks to attempt to reach a settlement resolution. If counsel can arrive at a resolution pretrial motions may be moot.
4. Counsel will be able to update the Court at the Status Conference set for July 7, 2015.

5. Counsel has discussed this request for an extension of the date for filing pretrial motions with the Assistant United States Attorney, Rob Livergood, and he has no objection to the extension.

6. It is Counsel's understanding that a trial date has not been set for the cause.

7. Counsel has discussed this request for continuance with the Defendant and he is in favor of this request.

8. This request for an extension of time is made in good faith for all the reasons listed herein and not to vex or harass the Court or the Government, but to ensure Defendant's Sixth Amendment right to effective assistance of counsel. The ends of justice will be best served by excluding these periods of delay from calculating deadlines that would otherwise apply. 18 U.S.C. §3161(h)(8).

WHEREFORE, for the foregoing reasons Counsel for Defendant requests an extension of the deadline for two weeks to file pre-trial motions.

Respectfully submitted,

FRANK, JUENGEL & RADEFELD,
ATTORNEYS AT LAW, P.C.

By: /s/ Daniel A. Juengel
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CERTIFICATE OF SERVICE

I hereby certify that on June 26, 2015, the foregoing was filed electronically with the Clerk of the Court to be served by operation of the Court's electronic filing system upon the following.

Rob Livergood
United States Attorney
111 South Tenth Street
St. Louis, Missouri, 63102.

/s/ Daniel A. Juengel
DANIEL A. JUENGEL